

# **EXHIBIT F TO DEFENDANTS' FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Exhibit F is a selection of pages from the deposition of Brian Lambert, conducted  
on June 25, 2018.

# EXHIBIT B

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

Charlottesville Division

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JASON KESSLER,

Plaintiff,

-vs-

Case No.  
3:18CV00015

CITY OF CHARLOTTESVILLE

and

MAURICE JONES,  
Charlottesville City Manager,  
In his individual and official  
capacities,

Defendants.

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DEPOSITION OF BRIAN ROLAND LAMBERT

9:30 a.m. to 1:40 p.m.

June 25, 2018

Charlottesville, Virginia

Job No.: 37200

REPORTED BY: Kimberly A. Adderley, RPR, RMR

1 Q. Has there ever been?

2 A. Not that I'm aware of. I never heard  
3 of the Proud Boys prior to a year ago.

4 Q. Have you ever heard of the Proud Boys  
5 beating someone in?

6 A. Yes.

7 Q. What does that mean?

8 A. Basically it's an initiation kind of  
9 thing where they -- you have to name off, I think,  
10 five breakfast cereals while they hit you, and  
11 then once you name the five breakfast cereals,  
12 they stop hitting you. It's silly. It's a joke.

13 Q. To your knowledge is Jason Kessler a  
14 Proud Boy?

15 A. He got initiated.

16 Q. Do you know about when that was?

17 A. It was about a year ago.

18 Q. Was it before or after August 12?

19 A. Before.

20 Q. Is he still a Proud Boy?

21 A. They disavowed him almost immediately  
22 after that.

23 Q. Do you know why exactly they disavowed  
24 him?

25 A. Because he's an asshole.

1 Q. And "we" meaning Unity and Security for  
2 America?

3 A. Yes.

4 Q. And how many of you were there?

5 A. Half a dozen maybe.

6 Q. Okay. And do you remember who exactly  
7 was there?

8 A. No.

9 Q. But it was you and Jason and four  
10 others?

11 A. Yes. Possibly more.

12 Q. And were you outside because you were  
13 not able to get tickets?

14 A. No. Basically any event that I  
15 attended with Jason, I was there to provide  
16 security.

17 Q. Okay. All right. So, let's do some  
18 other events that Jason had and, again, I don't  
19 want to put words in your mouth, but it's a fairly  
20 well-known phenomenon now about bloggers and  
21 others trying to get on social media. What I'm  
22 asking is do you think it would be fair to say  
23 that that's a partial motivation of Mr. Kessler's,  
24 to do things that can get him on social media?

25 A. Yes.

1 Q. And do you have an example of that?

2 A. He's all over the place.

3 Q. Do you think he ever stages things to  
4 get on social media?

5 A. Yes.

6 Q. Have you ever heard about him  
7 announcing in advance where he is going to be,  
8 hoping that some of his opposition will show up?

9 A. Yes.

10 Q. Can you give some examples of that?

11 A. We had planned a dinner downtown, this  
12 was about a year ago now, we went to Miller's on  
13 the Downtown Mall, it's an outdoor seating area,  
14 there was about a dozen of us, Kessler included,  
15 and within 20 or 30 minutes of being there, we  
16 find ourselves surrounded by his, quote/unquote,  
17 opposition screaming at us, yelling obscenities,  
18 and it went on for hours.

19 Q. And how did they know you were there?

20 A. It started with one person with a  
21 camera and literally turned into a flash mob.

22 Q. And the person that had the camera is  
23 one of the opposition?

24 A. A SURJ member, yes. First there was 1  
25 and then there were 5 and then there were 10 and

1 and this press conference reflected in the  
2 pictures, did you provide him security at any  
3 other time?

4 A. Probably one of the last dealings I had  
5 with him, because, I mean, it's gotten to the  
6 point where I don't want anything to do with him.  
7 I don't agree with a lot of things that he says,  
8 but I -- my attitude has been that even if I don't  
9 agree with it, I will still defend his right to  
10 say it. But, his other actions and callousness  
11 have led me to just completely break off all ties  
12 with him.

13 Q. What was he callous about?

14 A. Everything.

15 Q. Was he callous about Heather Heyer's  
16 death?

17 A. Yeah.

18 Q. Was he callous about the harm to  
19 people, the physical harm to people that attended  
20 his event?

21 A. He had no regard for that.

22 Q. Pardon me?

23 A. He has no regard for that.

24 Q. So, no regret that that happened?

25 A. No.

1 well how it was going to turn out.

2 Q. That who knew?

3 A. The City. The City created -- the City  
4 created this whole thing. They shut down that  
5 rally and they forced those people into a hostile  
6 crowd. If they would have just left it alone and  
7 let them stay in their park, do their little  
8 thing, have their little rally, they would have  
9 come and gone. But they created this.

10 Q. By shutting down the rally?

11 A. By shutting down the rally and forcing  
12 people out of the park into Antifa and Black Lives  
13 Matter waiting on the street, yes.

14 Q. And were you there when that happened?

15 A. No. I was up the street. I was on my  
16 way there.

17 Q. What else made you feel like there was  
18 a good chance that violence was going to happen?  
19 Can you be more specific about what you saw on  
20 Facebook?

21 A. What happened at Berkeley. Other  
22 protests and rallies across the country. You  
23 know, just the current climate. It made it pretty  
24 obvious to me that there was going to be trouble.

25 Q. Did you see anything to suggest that



1 Mr. Kessler knew that Charlottesville would be  
2 like a Berkeley?

3 A. He talked about it a lot.

4 Q. Talked about Berkeley and the violence  
5 there a lot?

6 A. Yeah. In his videos.

7 Q. Did you ever witness on Facebook or in  
8 any other way Mr. Kessler trying to minimize any  
9 chance of violence?

10 A. I think at one point he said something  
11 about not being armed.

12 Q. Was that on Facebook?

13 A. Yes.

14 Q. Did you ever see him talk about  
15 bringing signs and shields and helmets?

16 A. No. I do remember him -- vaguely I  
17 remember something about not bringing swastikas or  
18 anything, you know, that could be construed as  
19 hate speech.

20 Q. So, you don't think Jason is the one  
21 that invited the Nazis that you saw in McIntire  
22 Park?

23 A. I think that just was a result of the  
24 snowball effect, you know. I can't say that he  
25 invited them directly. Even when I went to

1 that that was going to happen.

2 Q. So, by that time you weren't attending  
3 the Unity and Security for America meetings?

4 A. No. I want to say at that point I  
5 don't think we were even having meetings anymore.  
6 There was the get together that we had at Miller's  
7 and I think that was sometime in June. It may  
8 have been May when that happened. And then there  
9 was another get together downtown with the Proud  
10 Boys, prior to which I had never heard of the  
11 Proud Boys in any capacity, only then did I go on  
12 YouTube and watched a few videos. One of the  
13 members is actually one of my Cub Scouts when I  
14 was a Scout leader years ago. And I hadn't seen  
15 him since he was, you know, a Cub Scout, so...

16 Q. What was the event about, the Proud  
17 Boys downtown?

18 A. He had invited them to town to create a  
19 spectacle, which he succeeded in doing. That's  
20 when they did their little initiation thing in the  
21 alley, which again, I didn't participate, I just  
22 observed.

23 Q. You were invited?

24 A. Hmm?

25 Q. You were invited to attend?

1 A. Yeah.

2 Q. Did he invite a number of people to  
3 attend?

4 A. Well, somehow he reached out to the  
5 Proud Boys. I'm not sure who he talked to or  
6 when. But, like I said, it was supposed to be a  
7 night where we were going to go downtown and hang  
8 out and have a few beers, and it turned into a  
9 fiasco.

10 Q. What made it --

11 A. SURJ showed up. We went to Cinema  
12 Taco, we ordered a beer, and we were told to  
13 leave. So, we left. And this is Jason now, I  
14 told Jason let's go somewhere else, let's get off  
15 the Mall. Let's go to the Lazy Parrot or Big  
16 Jim's Barbecue, somewhere not downtown. And he's  
17 like oh, no, no, no, no, I'm going to take them to  
18 Miller's. Man, don't take them to Miller's. So,  
19 he takes them to Miller's, they refuse them  
20 service. So, then we went down to the movie  
21 theater and we went in, ordered a beer, walked  
22 back outside, sat down.

23 The protesters showed up, started  
24 calling the movie theater, at which point they  
25 came out and we were asked to leave again. They

1 gave us our money and we left. You know, they  
2 refunded our money and we left.

3 And at that point SURJ had sent out  
4 their little flash mob and there was probably 50  
5 to 100 of them. And Jason is out there with his  
6 camera videoing the whole thing. He takes a  
7 perverse pleasure in that thing. You know, at  
8 that point I think the Proud Boys were just like  
9 what have we gotten ourselves into? So, by the  
10 end of the night, they pretty much disavowed  
11 Jason. That was a manufactured spectacle on his  
12 part.

13 Q. And where did the Proud Boys come in  
14 from?

15 A. I'm not sure.

16 Q. Are they from Virginia?

17 A. Yeah.

18 Q. But not from Charlottesville?

19 A. No. Well, I mean, I think a few of  
20 them may have been from Charlottesville. They  
21 handle from Charlottesville, but I don't think  
22 they live here.

23 Q. So, this was an event that was a Proud  
24 Boys event, but Mr. Kessler invited people that  
25 weren't Proud Boys to come?